

**California Regional Water Quality Control Board  
Santa Ana Region**

**January 18, 2002**

**ITEM:** 2

**SUBJECT:** A Comparison of the Three Southern California Area Municipal Separate Storm Sewer System (MS4) Permit Requirements

**Discussion:** The following is a comparison of the major components of the North Orange County MS4 Permit (Santa Ana Region, draft), South Orange County MS4 Permit (San Diego Region, draft) and the Los Angeles MS4 Permit (Los Angeles Region, adopted on December 13, 2001).

**1. DISCHARGE PROHIBITIONS:**

	Permit Requirements	
	Prohibits non-storm water	Lists exempted non-storm water discharges
Santa Ana	Yes	Yes, includes charity car washes
San Diego	Yes	Yes, does not include charity car washes
Los Angeles	Yes	Yes, includes charity car washes

**2. RECEIVING WATER LIMITATIONS:**

	Permit Requirement
	Receiving Water Limitation as per State Board Order No. 99-05
Santa Ana	Yes
San Diego	Yes
Los Angeles	Yes

**3. LEGAL AUTHORITY**

	Permit Requirements		
	Establish Legal Authority to prohibit illicit discharges and connections	Establish legal authority to prohibit other types of discharges	Establish legal authority to impose monetary penalties
Santa Ana	Yes	By July 1, 2003	Yes
San Diego	Yes	Within 1 year of adoption	No
Los Angeles	Yes	By Nov 1, 2002	No

Major Component Comparison between Santa Ana, San Diego  
(Southern Orange County), and Los Angeles MS4 Permits

#### 4. RESTAURANT INSPECTION PROGRAM

	Permit Requirement
	Develop a restaurant inspection program
Santa Ana	By July 1, 2002
San Diego	No specific requirement
Los Angeles	First inspection by 8/1/04; minimum two

#### 5. LITTER AND TRASH CONTROL

	Permit Requirements	
	Review litter and trash control ordinances and implement appropriate controls	Review Debris control measures and determine need for any additional controls
Santa Ana	By 7/1/03	By 7/1/03
San Diego	No specific requirement; part of public education	No specific requirement; part of public education
Los Angeles	No specific requirement; default requirements for trash TMDL	Only a requirement to establish legal authority to prohibit such discharges

Major Component Comparison between Santa Ana, San Diego  
(Southern Orange County), and Los Angeles MS4 Permits

**6. MUNICIPAL SOURCE IDENTIFICATION AND INSPECTIONS –  
CONSTRUCTION**

	Permit Requirements	
	Develop an inventory of construction sites, prioritize the sites and conduct inspections.	Provide training to municipal inspectors
Santa Ana	Permittee to develop Inventory by October 15, 2002. Establish inspection priorities for sites, where high = sites over 50 ac., over 5 ac that are tributary to 303(d) listed waters, or sites within 500 ft of an ASBS. Inspection intervals during wet season (10/1 – 4/30) include: High priority sites: once a month, medium priority sites: twice during the wet season, low priority sites: once during wet season. Dry season inspections: all sites as needed.	Inspectors must be trained by October 15, 2002, and annually thereafter.
San Diego	Co-permittees are to include in the Jurisdictional URMP: Prioritized inventory of all construction sites, planned inspection frequencies and methods of inspections	No specific inspector training requirements.
Los Angeles	Develop an inventory of construction sites by requiring the submittal of a SWPPP prior to issuing a grading permit for the site. Maintain inventory by tracking grading permits.	Train inspectors by August 1, 2002 and annually thereafter. For Permittees with a population of 250,000 or more, training deadline is February 3, 2003.

## 7. MUNICIPAL SOURCE IDENTIFICATION & INSPECTIONS –INDUSTRIAL FACILITIES

	Permit Requirements	
	Develop an inventory of industrial facilities and prioritize the list	Inspect industrial facilities
Santa Ana	All sites with business permits or other identifiable licensing by July 1, 2003. All remaining industrial sites to be added to database by July 1, 2005.	High priority sites must have the initial inspection performed by July 1, 2003. After July 1, 2003, all high priority sites are required to be inspected annually, medium sites-at least once every two years, and low priority sites-once per permit cycle.
San Diego	Requires a comprehensive inventory of all industrial sites.	Copermittees to submit planned inspection frequencies to the Principal Permittee in the Jurisdictional URMP document in one year.
Los Angeles	Requires a comprehensive inventory of all industrial sites. Additional criteria is given for specifically listed commercial facilities. Inventory is to be updated at least annually.	Inspections of all inventoried facilities are required to be conducted no later than August 1, 2004. Each facility shall be inspected twice during the five-year term of the Order.

## 8. MUNICIPAL SOURCE IDENTIFICATION & INSPECTIONS–COMMERCIAL

	Permit Requirements	
	Develop an inventory of commercial facilities/companies	Conduct inspections of all high priority sites.
Santa Ana	To be developed by July 1, 2003. This inventory is to be updated annually.	All high priority sites to be inspected at least once by July 1, 2004.
San Diego	An inventory is to be developed and updated annually.	All high priority sites to be inspected on an “as needed” basis with subsequent follow-up actions as necessary.
Los Angeles	An inventory is to be developed and information on its “critical” sources” updated at least annually.	First inspection to be conducted by August 1, 2004.

## 9. SEPTIC SYTEMS/PORTABLE TOILETS

	Permit Requirements	
	Determine the effect of septic system failures on storm water quality	Review oversight program for portable toilets
Santa Ana	By July 1, 2003	By July 1, 2003
San Diego	No specific requirements	No specific requirements
Los Angeles	No specific requirements	No specific requirements

## 10. NEW DEVELOPMENTS - PLANNING PROGRAMS

	Permit Requirements	
	Review CEQA process to incorporate potential storm water quality impacts and mitigation.	Review General Plan amendment process to consider storm water impacts during planning process
Santa Ana	Yes, by December 19, 2002	By December 19, 2002 with CEQA review
San Diego	To the extent feasible, revise environmental review process (no timelines included)	Storm water education program needed for Planners, Elected Officials, Developers, etc. (no timelines)
Los Angeles	Yes, immediately	Yes, to begin no later than August 1, 2002 and to be conducted at least annually thereafter.

**11. NEW DEVELOPMENTS - STANDARD URBAN STORM WATER  
MITIGATION PLANS (SUSMP) AND WATER QUALITY MANAGEMENT  
PLANS (WQMP)**

	Permit Requirements		
	Develop and implement a WQMP (SUSMP) by a specified date.	Minimize the effects of urbanization on site hydrology, urban runoff flow rates or velocities and pollutant loads.	Requires pollutant reductions in post-development runoff using BAT/BCT.
Santa Ana	Yes, submit WQMP to the Executive Officer by March 1, 2003.	Yes	Yes
San Diego	Yes, Collective model SUSMP within 365 days; local SUSMPs to be developed 6 months later	Yes	Not specifically included.
Los Angeles	Yes, amend codes and ordinances to give legal effect to SUSMP changes by August 2, 2002, with requirements to take effect by September 2, 2002	Yes	Yes, through post-construction treatment control BMPs

## 12. MANAGEMENT PLANS

	Permit Requirements			
	Implement Existing DAMP or SQMP	Amend DAMP/SQMP	Develop local URMP/SQMP	Establish a Watershed Management Committee
Santa Ana	Yes	Amend DAMP if needed or if directed by the Executive Officer	No specific requirements for local management plans	Already Established
San Diego	Yes	None for DAMP; new URMP required	Develop URMP within 365 days of adoption	Not required
Los Angeles	Yes	Revise if directed by the Executive Officer	Develop a local SQMP by 8/1/02	Required

## 13. NEW DEVELOPMENTS – GENERAL PLAN

	Permit Requirements		
	Revise or update General Plans to include watershed and storm water quality and quantity management considerations for:		
	Land Use	Housing	Conservation
Santa Ana	Yes	Yes	Yes
San Diego	Yes	Yes	Yes
Los Angeles	Yes	Yes	Yes

## 14. NEW DEVELOPMENTS – REGIONAL SOLUTIONS

	Permit Requirement
	Develop and implement regional solutions
Santa Ana	Recognizes and encourages regional solutions
San Diego	No specific requirements
Los Angeles	No specific requirements; allows mitigation payment for regional systems

## 15. PUBLIC EDUCATION

	Permit Requirements		
	Develop catch-basin model stenciling procedures	Establish a hotline for reporting spills, leaks, illegal discharges	Conduct a storm water pollution public awareness assessment survey
Santa Ana	Stenciling mostly complete; procedures required by 7/1/02	Already in place	To be completed by 7/1/02
San Diego	Not specifically stated, may be part of "preventative maintenance"	Not specifically mentioned	No requirement
Los Angeles	To be completed by 2/4/04	Encouraged	Yes – to be completed by 5/1/02

## 16. MUNICIPAL FACILITIES/ACTIVITIES – STREET SWEEPING

	Permit Requirement
	Conduct Street Sweeping at a specified frequency
Santa Ana	By July 2002 permittee to develop and distribute model maintenance procedures to include street sweeping. To be reported in 2001-2002 annual report
San Diego	No specific requirement.
Los Angeles	Priority A-areas generating high volumes of trash or debris – 2x per month; Priority B-areas generating moderate quantities - at least once per month; Priority C- areas generating low volumes – swept as necessary



# **17. MUNICIPAL FACILITIES/ACTIVITIES – CATCH BASIN INSPECTIONS AND MAINTENANCE**

	Permit Requirements	
	Review public agency activities to ensure receiving water quality protection	Conduct regular inspections, maintenance, and cleaning of catch basins and storm water conveyances
Santa Ana	Environmental Performance Report completed; annual review required by July 1 of each year	By July 1, 2002 develop model maintenance: procedures, inspection protocols, inspect and maintain at least 80% of the drainage facilities annually and 100% within a two year period. Additional programs by July 1, 2004.
San Diego	No specific requirements.	Requires a maintenance schedule for all structural BMPs. Additional cleaning as necessary between 10/1 and 4/30 each year.
Los Angeles	SWPPP to be implemented by each Permittee at public vehicle maintenance facilities, material storage facilities and corporate yards	Cleaning intervals for priority A rated drains – 3x per wet season, priority B rated – once during wet season and priority C rated – once per year.

# **18. TMDL IMPLEMENTATION**

	Permit Requirement
	Implement TMDLs per the implementation plan
Santa Ana	Yes
San Diego	No
Los Angeles	No (includes default requirements)

## 19. MONITORING

	Permit Requirements		
	Continue Current monitoring program	Develop new monitoring program by.....	Requires dry/ wet weather and receiving water monitoring
Santa Ana	Yes	July 1, 2003	Yes
San Diego	Yes	Revise annually	Yes
Los Angeles	Yes	Assessed annually in 10/15 reporting	Yes

### SUMMARY:

A comparison of the major components of the three permits (only the Los Angeles permit has been adopted) indicates that the core requirements of the three permits are very similar and the differences do not appear to be significant. There are, however, regional and programmatic differences in these permits. The San Diego permit is more prescriptive compared to the other two. The Los Angeles permit has identified critical sources of pollutants and specified inspection frequencies for those. The Santa Ana permit provides flexibility to the permittees to prioritize the pollutant sources and conduct inspections based on this priority.